

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

LOREN OWENS,

Plaintiff,

Case No. 1:24-CV-00547

Hon. Jane M. Beckering
Magistrate Judge Phillip J. Green

v

Adroit Health Group et al.,

Joshua S. Goodrich, J.D., LL.M. (P83197)
LIGHTHOUSE LITIGATION PLLC
5208 W. Saginaw Hwy 81142
Lansing, Michigan 48908
269.312.7435
jsgoodrich@lighthouse-litigation.com

Attorneys for Plaintiff

Janet Ramsey (P63285)
WARNER NORCROSS + JUDD LLP
150 Ottawa Ave., NW, Ste. 1500
Grand Rapids, Michigan 49503
616.752.2736
jramsey@wnj.com

Jeffrey B. Pertnoy (PHV)
AKERMAN
Three Brickell City Centre
98 Southeast Seventh Street
Miami, Florida 33131
305.982.5524
Jeffrey.pertnoy@akerman.com

Thomas B. Fullerton
Akerman LLP
71 S. Wacker Dr., Ste. 4600
Chicago, IL 60606
312.634.5726
Thomas.Fullerton@akerman.com

*Attorneys for Defendants Tyler Long and
Wesley Cunha*

Jamey R. Campellone
GREENSPOON MARDER LLP
200 East Broward Blvd., Suite 1800
Fort Lauderdale, FL 33301
Tel: 954.527.6296
Email: jamey.campellone@gmlaw.com
Email: gabby.mangar@gmlaw.com

*Attorneys for Defendant, Adroit Health
Group, LLC*

**UNOPPOSED MOTION
TO ADJOURN AND RESCHEDULE HEARING**

NOW COMES Plaintiff, by and through undersigned counsel, and respectfully requests that this Honorable Court adjourn and reschedule the hearing on the Motion to Expedite (#26) currently scheduled for September 16, 2024, at 1:30 PM (#36). In support of this motion, Plaintiff states the following:

Scheduled Hearing: The hearing on Plaintiff's Motion to Expedite is presently scheduled for September 16, 2024, at 1:30 PM before Magistrate Judge Phillip J. Green in the 499 Federal Building, Grand Rapids, Michigan.

Conflicting Obligation:

Counsel for the Plaintiff is scheduled to mediate *Pro Se* Prisoner Civil Rights Litigation Early Mediation case on September 16, 2024, from 1:15 PM to 4:30 PM *Pro Bono*. For this honorable court. These mediation cases require coordination with the Michigan Department of Corrections and the Michigan Attorney General's Office. This order was issued by Magistrate Judge Phillip J. Green on August 13, 2024.

Proposed Alternative Date: Counsel for Plaintiff has conferred with the chambers of Magistrate Judge Phillip J. Green and opposing counsel. All parties and counsel have confirmed their availability for **Thursday, September 26, 2024, at 10:00 AM.**

No Prejudice: The requested adjournment will not prejudice either party and is sought in good faith to accommodate the mediation and ensure full participation in the hearing by all counsel.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court adjourn and reschedule the hearing on Plaintiff's Motion to Expedite (#26) to September 26, 2024, at 10:00 AM or another date convenient for the Court.

Respectfully submitted

Dated: September 12, 2024,

Respectfully submitted,
By: /s/ Joshua S. Goodrich, J.D., LL.M.
Lighthouse Litigation PLLC
5208 W. Saginaw Hwy., 81142
Lansing, MI 48917
Email: jsgoodrich@lighthouse-litigation.com
269.312.7435

Attorneys for Plaintiff, Loren J. Owens

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12st day of September 2024, a copy of the foregoing ***UNOPPOSED MOTION TO ADJOURN AND RESCHEDULE HEARING*** was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Joshua S. Goodrich, J.D., LL.M.
JOSHUA S. GOODRICH, J.D., LL.M.